

### **REMARKS**

Claims 1-159, 164-166, 168-170, 179, 180, 182, 185-187, 189, 190, 194, 195, 197, 200-202, 204-206, 209, and 210 presently stand rejected. Claim 184 is formally withdrawn per the previous Office Action. Applicant intended to withdraw claim 184, but did not label the claim as such in the previous response. Applicant respectfully requests the Examiner to reconsider all the outstanding rejections and to withdraw them based on the reasons demonstrated here. By submitting this response within two months of the final office action, Applicant requests an Advisory Action from the Examiner with the hope that any outstanding issues can be resolved to allow this application to pass to issue. The undersigned representatives respectfully request the Examiner to call them in order to resolve the outstanding issues.

#### ***Relevant Prosecution History***

The present claims are rejected based solely on U.S. Patent No. 5,655,085 issued to Ryan et al. (referred to as “Ryan II”). Ryan II is a continuation-in-part of U.S. Patent No. 5,673,402 issued to Ryan et al. (referred to as “Ryan I”). The different subject matter in Ryan II is directed to “illustrations of insurance” that can be produced rather than “illustrations of collateral used to repay a mortgage,” which was disclosed in Ryan I. Other than that difference, the methods and systems of Ryan I and Ryan II are substantially similar, if not identical. During prosecution of U.S. Patent No. 5,987,434, Ryan I was the only reference used to reject the claims. Applicant demonstrated the differences between Ryan I and the claims in the application of the ‘434 patent, which resulted in issuance of the ‘434 patent. For the Examiner’s convenience, Applicant has included the relevant office action and response from the U.S. 5,987,434 file history (see attached Appendix A).

The present application is a continuation-in-part of U.S. Patent 5,987,434. Applicant demonstrates below the reasons by which the present claims are also allowable over Ryan II, for reasons that are largely similar to those presented before to overcome Ryan I in the U.S. Patent 5,987,434 prosecution.

### ***35 U.S.C. § 102 Rejections***

Claims 1-11, 53-73, 116-131, 139-141, 143-159, 164-169, 179, 182, 185-187, 189-190, 194-195, 197, 200-202, 204-206, 209-210 presently stand rejected under 35 U.S.C. § 102(b) as being anticipated by Ryan II. Applicant respectfully traverses this rejection.

Ryan II does not teach each and every element of the present claims. In general, Ryan II discloses a computerized system for producing illustrations of universal life insurance policies. Ryan II teaches a standard manual computer system where a user sits down with a prospective client and manually enters data using a keyboard. The manually-entered information includes information regarding the client and the universal life insurance policy parameters. The system uses this information to provide a typical universal life insurance illustration. The illustration is a tool for the user to project the estimated values of the particular life insurance chosen to a customer.

The Examiner indicates at page 2 of the Office Action, that Ryan II's Abstract anticipates a computer-implemented method of automatically preparing a communication pertaining to a product for specific entities. Applicant disagrees. Ryan II describes a **manual** method (requiring user entry) for providing universal life insurance illustrations. As defined by Ryan II, "An illustration is a projection of estimated policy values over a defined period beginning in the present." (see Ryan II, col. 2, lines 60-61). This is not the same as multiple offerings produced for a high volume of entities with each offer specific to the entity as claimed.

The Examiner further indicates at page 2 of the Office Action that Figure 7 anticipates using the processor to consider client data on specific entities and determine whether to offer a financial product or a financial service or both to the specific entities. Applicant disagrees. In Ryan II, at the time a user sits down at the computer, a determination has already been made whether to offer a product to a specific entity, that is, the product that is already determined is universal life insurance. This determination is not made by a processor. As disclosed in Ryan II, "FIG. 7 represents a User Screen shown on a monitor or other output device and produced by

means of the computer system of the present invention, to be seen **by the system users as they prepare or update illustrations.**” (see col. 8, lines 43-46).

Contrary to this disclosure in Ryan II, the Examiner indicates at page 3 of the Office Action that Block 140, FIG. 3B-1, and the Abstract anticipate the claimed limitation that the “processor makes a determination to offer said financial product or said financial service or both to said entity, then the processor uses client-specific decision information to automatically select parts of variable information from at least two different databases with client data and financial product data to determine the variable information specific to each specific entity and select the parts of the variable information determined for inclusion in a communication formulated to express the offering for said specific entity.” Again, Applicant disagrees. First, Ryan II does not disclose a processor that makes a determination to offer any financial product. It merely calculates projected illustrations.

Second, nowhere in Ryan II is client-specific decision information used to select parts of variable information from at least two different databases with client data and financial product data to determine the variable information specific to each specific entity. Ryan II does not contemplate variable information as it is defined by Applicant’s specification and claims. The citations provided by the Examiner merely describe a gathering process whereby client data that is manually entered by the user and formulas needed to project life insurance values are retrieved. For example, Figs. 5-14 reveal that **the user manually enters all the pertinent information.**

Moreover, the Abstract citation teaches away from any disclosure of variable information determination. For example, the Abstract states “A computer accesses a database into which data is written and from which data is read, the data including information regarding the life to be insured, general applicant information, insurance information and **predetermined text data** for incorporation into insurance illustrations.” (emphasis added). Predetermined text data certainly does not constitute variable information as claimed.

The Examiner next indicates at page 3 of the Office Action that Figure 27A in Ryan II anticipates the claimed limitation “using an output module associated with the processor and configured to use at least one automated process to automatically compose the variable information comprising the parts determined to create and generate the communication for each

said specific entity such that at least one portion within the communication accommodates the variable information, wherein said variable information for each specific entity comprises at least partially a customized identification, specification and/or promotion of said financial product or said financial service or both wherein said variable information for each specific entity has at least some data that is different.” Applicant disagrees.

Ryan II does not disclose all the elements of the present claims. Ryan II states that after the values of the illustration are produced, they are “displayed at the user’s terminal in Block 168, and stored in the Database 26. **The user can select a number of options:** Print Illustration? 172, which will print the information on the Local Printer 30 via Block 174; Print and Mail Illustration? 176, which will print the illustration on the Central Printer 20 for mailing to a requested address via Block 178; and Make Application Using This Illustration? 180, which merges illustration results for further analysis or review.” (see col. 22, lines 27-36). Nowhere does Ryan II disclose an **automated process to automatically compose the variable information determined to create and generate the communication for each specific entity....** Any output **necessarily needs manual input by a user.**

Accordingly, Ryan II does not anticipate the present claims as it does not disclose each and every element of the claims as Applicant has demonstrated here. Applicant respectfully submits that the claims are in condition for allowance and requests withdrawal of this rejection.

### ***35 U.S.C. § 103 Rejections***

Claims 12-52, 74-115, 132-138, 142, 170 and 180 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ryan II. Applicant respectfully traverses this rejection.

Claims 12-52, 74-115, 132-138, 142, 170 and 180 variously depend from the independent claims discussed above. The Examiner does not cite any other reference for the rejection of claims 12-52, 74-115, 132-138, 142, 170 and 180. Nowhere does Ryan II disclose an automatic process for producing high volume offers in an automated manner. Like Ryan I, Ryan II also does not disclose all the elements of the present claims. In fact, Ryan II also teaches away from the present claims. A person of ordinary skill in the art would take Ryan II as teaching a manual input system for illustrating life insurance policies to one prospective client at a time. After an illustration is performed, Ryan II merely discloses creating and printing insurance application

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Reply to Final Office Action of: August 19, 2008

forms. The forms are standard industry forms and the client data is from the user who manually entered the data at the beginning of the process.

As such, Applicant submits that these claims are patentable over Ryan II for at least the reasons discussed under the § 102 section as well as those discussed here. Accordingly, Applicant respectfully submits that the claims are in condition for allowance and requests withdrawal of this rejection.

### ***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections, and that they be withdrawn. Applicant also requests an Advisory Action. Again, the Examiner is requested to telephone the undersigned representative if an interview might expedite allowance of this application.

Respectfully submitted,

BERRY & ASSOCIATES P.C.

Dated: October 20, 2008

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## **APPENDIX A**





**UNITED STATES DEPARTMENT OF COMMERCE  
Patent and Trademark Office**

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Washington, D.C. 20231

APPLICATION NO. 08/06, 007	FILING DATE 06/10/96	FIRST NAMED INVENTOR LIBMAN	ATTORNEY DOCKET NO. R
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ART UNIT 2762	PAPER NUMBER 4
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DATE MAILED: 05/11/98

Please find below and/or attached an Office communication concerning this application or proceeding.

Commissioner of Patents and Trademarks

# Office Action Summary

Application No.

08/661,004

Applicant(s)

Libman

Examiner

Romain Jeanty

Group Art Unit

2762



☒ Responsive to communication(s) filed on Aug 5, 1997

☐ This action is **FINAL**.

☐ Since this application is in condition for allowance except for formal matters, **prosecution as to the merits is closed** in accordance with the practice under *Ex parte Quayle*, 35 C.D. 11; 453 O.G. 213.

A shortened statutory period for response to this action is set to expire three month(s), or thirty days, whichever is longer, from the mailing date of this communication. Failure to respond within the period for response will cause the application to become abandoned. (35 U.S.C. § 133). Extensions of time may be obtained under the provisions of 37 CFR 1.136(a).

## Disposition of Claim

☒ Claim(s) 1-56 is/are pending in the application.

Of the above, claim(s) \_\_\_\_\_ is/are withdrawn from consideration.

☐ Claim(s) \_\_\_\_\_ is/are allowed.

☒ Claim(s) 1-56 is/are rejected.

☐ Claim(s) \_\_\_\_\_ is/are objected to.

☐ Claims \_\_\_\_\_ are subject to restriction or election requirement.

## Application Papers

☒ See the attached Notice of Draftsperson's Patent Drawing Review, PTO-948.

☐ The drawing(s) filed on \_\_\_\_\_ is/are objected to by the Examiner.

☐ The proposed drawing correction, filed on \_\_\_\_\_ is ☐ approved ☐ disapproved.

☐ The specification is objected to by the Examiner.

☐ The oath or declaration is objected to by the Examiner.

## Priority under 35 U.S.C. § 119

☐ Acknowledgement is made of a claim for foreign priority under 35 U.S.C. § 119(a)-(d).

☐ All ☐ Some\* ☒ None of the CERTIFIED copies of the priority documents have been received.

☐ received in Application No. (Series Code/Serial Number) \_\_\_\_\_.

☐ received in this national stage application from the International Bureau (PCT Rule 17.2(a)).

\*Certified copies not received: \_\_\_\_\_

☐ Acknowledgement is made of a claim for domestic priority under 35 U.S.C. § 119(e).

## Attachment(s)

☒ Notice of References Cited, PTO-892

☒ Information Disclosure Statement(s), PTO-1449, Paper No(s). 3

☐ Interview Summary, PTO-413

☒ Notice of Draftsperson's Patent Drawing Review, PTO-948

☐ Notice of Informal Patent Application, PTO-152

--- SEE OFFICE ACTION ON THE FOLLOWING PAGES ---



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**DETAILED ACTION**

1. Claims 1-56 are presented for examination.

***Claim Rejections - 35 U.S.C. § 102***

2. The following is a quotation of the appropriate paragraphs of 35 U.S.C. 102(b) that form the basis for the rejections under this section made in this Office action:

A person shall be entitled to a patent unless --

(b) the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, more than one year prior to the date of application for patent in the United States.

3. Claims 1, 2, 8-10, 12-13, 15-18, 21-25, 27-29, 35-37, 39-40, 42-45, 48-52, and 53-56 are rejected under 35 U.S.C. 102 (b) as being unpatented over Ryan et al. (U.S. Pat. 5,673,402).

As per claim 1, Ryan et al. teaches an apparatus for using client information about clients in the form of plurality of client records to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the inputting means automatically inputting the plurality of client

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records without human intervention between input of the respective client records (col. 18, lines 37-44); and

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39); and

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 8, lines 21-28); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

As per claim 2, Ryan et al. teaches a method for using client information about clients comprising a plurality of client records to automatically select and present financial products appropriate for the clients (col. 8, lines 4-11); and

Ryan et al. also teaches a method for automatically inputting into a computer-accessible storage medium the client information including the plurality of client records without human intervention between input of the respective client records, inputting information about the financial products, and inputting decision criteria pertaining to selection from among the financial products (col. 8, lines 11-17); and

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using a central processing unit in communication with the storage medium to select a subset of the financial products for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria (col. 18, lines 58-64); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products appropriate for that client (col. 18, lines 51-56).

As per claim 8, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11); and

Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the client information comprising information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client (col. 19, lines 14-21);

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39);

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means operatively coupled to the storing means for using (a) the client information including the information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, (b) the financial products information, and (c) the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 19, lines 14-21); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col.18, lines 51-56).

As per claim 9, Ryan et al. teaches an apparatus as recited in claim 8, wherein: the financial products comprise life insurance products and the inputting means comprise means for inputting the financial products information to include information regarding individual life insurance products other than term life insurance products (col. 9, lines 17-27).

As per claim 10, Ryan et al. teaches an apparatus as recited in claim 8, wherein: the inputting means includes means for inputting the financial product information as term life insurance product information and permanent life insurance product information (col. 11, lines 8-11); and

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the selecting means includes means for selecting the term life insurance product information and the permanent life insurance product information as part of the subset of financial products (col. 9, lines 20-31).

As per claim 12, Ryan et al. teaches an apparatus as recited in claim 8, wherein:

the inputting means includes means for inputting the client information to include a financial income (col. 45, lines 1-4); and

the selecting means includes means for selecting the subset of financial products based upon the financial income (col. 45, lines 1-4).

As per claim 13, Ryan et al. teaches an apparatus as recited-in claim 8, wherein:

the inputting means includes means for inputting the client information to include a mortgage amount ( col. 19, lines 28-33); and

the selecting means includes means for selecting the subset of financial products based upon the mortgage amount (col. 19, lines 38-40).

As per claim 15, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

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Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the financial product information including a plurality of plans wherein at least one of the plans includes a plurality of the financial products (col. 22, lines 61-65); and

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39); and

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products in the form of a plurality of the plans for each of the clients appropriate for that client (col. 22, lines 61-65); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

As per claim 16, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).



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Ryan et al. also teaches means for inputting the client information, information about the financial products, ancillary data, and decision criteria pertaining to selection from among the financial products (col. 22, lines 46-53); and

means operatively coupled to the inputting means for storing the client information, the financial products information, the ancillary data and the decision criteria (col. 18, lines 27-39);

means operatively coupled to the storing means for using the client information, the financial products information, the ancillary data and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 18, lines 21-28); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

As per claim 17, Ryan et al. teaches an apparatus as recited in claim 16, wherein:  
the inputting means comprises means for inputting the ancillary data to include statistical data (col. 20, lines 12-15); and

the selecting means includes means for using the statistical data to select the subset of financial products (col. 20, lines 12-15).

As per claim 18, Ryan et al. teaches an apparatus as recited in claim 16, wherein:

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the inputting means comprises means for inputting the ancillary data to include geo-code data (col. 20, lines 6-11); and

the selecting means includes means for using the geo-code data to select the subset of financial products for that client (col. 20, lines 12-15).

As per claim 21, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches means for inputting (a) the client information, (b) information about the financial products including product price data and non-price product information, and (c) decision criteria pertaining to selection from among the financial products (col. 8, lines 29-43); and

means operatively coupled to the input means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39); and

means operatively coupled to the storing means for using the client information, the financial products information including the non-price product information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 8, lines 29-43); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

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As per claim 22, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

means for inputting the client information, information about the financial products, a plurality of plans each of which includes at least one of the financial products, and decision criteria pertaining to selection from among the plans (col. 22, lines 61-65); and

means operatively coupled to the inputting means for storing the client information, the financial products information, the plans, and the decision criteria (col. 18, lines 27-39); and

means operatively coupled to the storing means for using the client information, the financial products information, the plans and the decision criteria to select a subset of the plans for each of the clients appropriate for that client, the subset of the plans including at least one-plan comprising a plurality of the financial products (col. 22, lines 46-53); and

means for preparing a client communication for each of the clients which identifies the subset of the plans for that client (col. 18, lines 51-64).

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As per claim 23, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products (col. 18, lines 37-44); and

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39); and

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 8, lines 21-28); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication preparing means incorporating a portion of the client information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client (col. 19, lines 14-21).

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As per claim 24, Ryan et al. teaches an apparatus as recited in claim 23, further including means operatively coupled to the client communication preparing means for outputting the client communications to a remote location (col. 7, lines 1-6).

As per claim 25, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products (col. 18, lines 37-44); and

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 37-44);

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client (col. 8, lines 21-28); and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication means further using words/paragraphs/sentence logic to incorporate at least one of variable

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words, variable paragraphs, and variable sentences into each of the client communications (col. 18, lines 51-64).

As per claim 27, Ryan et al. teaches an apparatus as recited in claim 25, further including means operatively coupled to the client communication preparing means for outputting the client communications to a remote location (col. 7, lines 1-6).

As per claim 28, Ryan et al. teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products (col. 8, lines 11-17); and

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39);

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients; (col. 8, lines 21-28); and



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means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication preparing means incorporating into each of the client communications a portion of the client information for that client and a portion of the financial products information for the subset of products selected for that client, the client communication preparing means further using at least one of (a) customer information logic, (b) words/paragraphs/sentence logic, (c) product/plan/amount of coverage/payment mode/underwriting logic, and (d) pricing logic to incorporate at least one of the client information and the financial product information into a footnote within each of the client communications (col. 18, lines 51-64);.

As per claim 29, Ryan et al. teaches an apparatus as recited in claim 28- further including means operatively coupled to the client communication preparing means for outputting the client communications to a remote location (col. 7, lines 1-6).

As per claim 35, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches inputting into a computer-accessible storage medium the client information, information about the financial products, and decision criteria

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pertaining to selection from among the financial products, the client information comprising information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client (col. 19, lines 14-21); and

using a central processing unit in communication with the storage medium to select for each of the clients a subset of the financial products appropriate for that client using (a) the client information including the information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, (b) the financial products information, and (c) the decision criteria (col. 19, lines 14-21); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-56).

As per claim 36, Ryan et al. teaches a method as recited in claim 35, wherein the financial products comprise life insurance products and the inputting step includes inputting information regarding individual life insurance products other than term life insurance product (col. 9, lines 17-27).

As per claim 37, Ryan et al. teaches a method as recited in claim 35, wherein: the inputting step includes inputting term life insurance product information and permanent life insurance product information as part of the financial product information

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(col. 9, lines 20-31); and the selecting step includes selecting as part of the subset of financial products for the clients the term life insurance product information and the permanent life insurance product information (col. 9, lines 20-31).

As per claim 39, Ryan et al. teaches method as recited in claim 35, wherein:  
the inputting step includes inputting a financial income for each of the clients as part of the client information (col. 45, lines 1-4); and

the selecting step includes selecting the subset of financial products for each of the clients based upon the financial income for that client (col. 9, lines 1-4).

As per claim 40, Ryan et al. teaches a method as recited in claim 35, wherein:  
the inputting step includes inputting a mortgage amount as part of the client information (col. 9, lines 10-17);  
and the selecting step includes selecting the subset of financial products based upon the mortgage amount (col. 9, lines 1-10).

As per claim 42, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11);

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the client information, the financial products information. the ancillary data and the decision criteria (col. 20, lines 12-15); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

As per claim 44, Ryan et al. teaches a method as recited in claim 43, wherein:

the inputting step includes inputting statistical data as part of the ancillary data (col. 20, lines 6-11); and

selecting step includes using the statistical data to select the subsets of financial products for the clients (col. 20, lines 12-15).

As per claim 45, Ryan et al. teaches a method as recited in claim 43, wherein:

the inputting step includes inputting geo-code data as part of the ancillary data (col. 20, lines 12- 15); and

the selecting step includes using the geo-code data to select the subsets of financial products for the clients (col. 20, lines 6-11)..

As per claim 48, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

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Ryan et al. also teaches a method for inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products including product price data and non-price product information, and (c) decision criteria pertaining to selection from among the financial products (col. 8, lines 11-17); and

using a central processing unit in communication with the storage medium to select a subset of the financial products for each of the clients appropriate for that client using the client information, the financial products information including the non-price product information, and the decision criteria; and (col. 18, lines 51-64); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64).

As per claim 49, Ryan et al. teaches a method for a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches a method for inputting into a machine-readable storage medium the client information, information about the financial products, a plurality of plans each of which includes at least one of the financial products, and decision criteria pertaining to selection from among the plans (col. 22, lines 61-65);

using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the

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client information, the financial products information, the plans and the decision criteria, the subset of the plans including at least one plan comprising a plurality of the financial products (col. 22, lines 61-65); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the plans for that client (col. 18, lines 51-64).

As per claim 50, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches a method for inputting into a machine-readable storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products (col. 22, lines 46-53);

using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria (col. 18, lines 58-64); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication incorporating a portion of the client information other than a client name,



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address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client (col. 19, lines 14-21).

As per claim 51, Ryan et al. teaches a method as recited in claim 50, wherein the output step includes outputting the client communications to a remote location (col. 17, lines 1-6).

As per claim 52, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches a method for inputting into a machine-readable storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products (col. 8, lines 11-17)

using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria (col. 22, lines 46-53); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication preparing step further including using words/paragraphs/ sentence logic

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to incorporate at least one of variable words, variable paragraphs, and variable sentences into each of the client communications (col. 18, lines 51-64).

As per claim 54, Ryan et al. teaches a method as recited in claim 52, wherein the outputting step further includes outputting the client communications to a remote location (col. 7, lines 1-6).

As per claim 55, Ryan et al. teaches a method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

inputting into a machine-readable storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products col. 18, lines 37-44);

using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information the financial products information, and the decision criteria (col.22, lines 61-65); and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, wherein each of the client communications includes a portion of the client information for that client and a

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portion of the financial products information for the subset of products selected for that client, the client communication preparing step including using at least one of (a) customer information logic, (b) words/paragraphs/sentence logic, (c) product/plan/amount of coverage/payment mode/underwriting logic, and (d) pricing logic to incorporate at least one of the client information and the financial product information into a footnote within each of the client communications (col. 18, lines 51-64).

As per claim 56, Ryan et al. a method as recited in claim 55, wherein the outputting step further includes outputting the client communications to a remote location (col. 7, lines 1-6).

***Claim Rejections - 35 U.S.C. § 103***

4. The following is a quotation of 35 U.S.C. 103(a) which forms the basis for all obviousness rejections set forth in this Office action:

(a) A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negated by the manner in which the invention was made.

5. Claims 3, 4, 5, 6, 7, 11, 30, 31, 32, 33, 34, 38 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Ryan et al. as applied to claim 1 above.

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As per claims 3, 4, 5, 6, 7, 30, 31, 32, 33, 34, Ryan et al. substantially specifies user input, but does not specify the type of input device used. It is well known in the art that there are various types of input devices for computer systems, to include, keyboards mouse, disk drive, CD-ROM drives, tape drive, optical scanners, a code reader, and a modem. These types of devices could be used for receiving input data. One would have been motivated to use one or more of these devices in order to provide the most convenient method of inputting information and in view of Ryan et al.'s description of receiving user input.

As per claims 11, 38, Ryan et al. substantially teaches an apparatus and a method as recited in claims 8 and 35, but, fails to teach the inputting means inputs the financial product information as product price data and non-price product information; and the selecting means selects the subset of financial products based upon the non-price product information. Official notice is taken that inputting means inputs the financial product information as product price data and non-price product information; and the selecting means selects the subset of financial products based upon the non-price product information is old and well-known in the business art. For example, clients select financial products based on public policy concerns and a company's attitude to those public policy issues. It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to use the techniques described above. One would have been motivated to use these techniques, because, this

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motivation would provide the Ryan et al.'s teachings with the enhanced capability to provide better satisfaction to customers.

As per claims 19 and 46, Ryan et al. substantially teaches method for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines); using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-56), but, fails to teach inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products including at least one term life insurance product and at least one insurance product other than a term life insurance product. Official notice is taken that inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products including at least one term life insurance product and at least one insurance product other than a term life insurance product, and (c) decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select for each of the clients a subset of the financial products appropriate for that client using the client information, the financial products information, and the decision criteria, the subset of the financial products including the at least one term life insurance product and the at least one insurance product other than a term life insurance product is old and well-known in the business art that clients would recognize to have both types of insurance. It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to include these techniques in Ryan's teachings. One would have

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been motivated to use these techniques, because, this motivation would provide the Ryan et al.'s teachings with the enhanced capability to provide both types of insurance benefits to clients.



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6. Claims 14, 20, 41, 47 are rejected under 35 U.S.C. 103 (a) as being unpatented over Ryan et al. (U.S. Pat. 5,673,402) in view of Clark et al. (U.S. Pat. 5,710,889).

As per claims 14, 20, 41, 47 Ryan et al. substantially teaches an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients (col. 8, lines 4-11).

Ryan et al. also teaches a means for inputting the client information, information about the financial products including financial products having the differing face value amounts, and decision criteria pertaining to selection from among the financial products;

means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39);

means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, the selecting means including means for selecting the subset of financial products to include the financial products having the differing face value amounts; and

means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-56). Ryan et al. substantially teaches all the limitations noted above, but, he does not teach a financial

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product having a face value amounts. However, Clark et al. teaches a financial product having a face value amount (col. 24, lines 61-65). It would have been obvious to one of ordinary skill in the art at the time the invention was made to modify any part of Ryan et al. teachings, by including, a financial product having a face value amount, because this modification would provide Ryan et al.'s teachings with the enhanced capability to provide better services to insurance owners.

As per claims 26, and 53, Ryan et al. substantially teaches an apparatus and an associated method as recited in claims 25, and 52, for preparing each of the client communications (col 18, lines 51-64).

a first section including header information comprising the client information for that client, and a second section including product presentation information comprising the financial product information for the subset of the financial products for that client and a portion of the client information for that client. But, he does not teach the use of a header information. However, Clark et al. teaches the use of a header information (col. 8, lines 11-18). It would have been obvious to one of ordinary skill in the art at the time the invention was made to modify any part of Ryan et al.'s teachings, by including, a header information method. One would have been motivated to use a header information method in order to provide more information to clients.

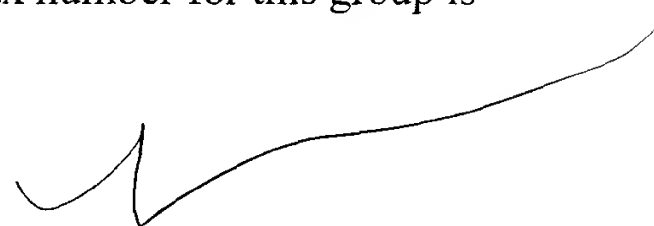
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### Conclusion

7. Any inquiry concerning this communication or earlier communications from the examiner should be directed to Romain Jeanty whose telephone number is (703) 308-9585. The examiner can normally be reached on weekdays from 8:00 a.m to 4:30 p.m.

If attempts to reach the examiner are not successful, the examiner's supervisor, Allen R. MacDonald, can be reached at (703) 305-9708. The fax number for this group is (703) 305-3988.

RJ/



ALLEN R. MACDONALD  
SUPERVISORY PATENT EXAMINER

PATENT

Docket No. 430-002

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

Richard Marc Libman

Entitled: APPARATUS AND  
METHOD FOR TRANSACTING  
MARKETING AND SALES OF  
FINANCIAL PRODUCTS

Filed: June 10, 1996

Serial No.: 08/661,004

Assistant Commissioner  
for Patents  
Washington, D.C. 20231

AMENDMENT A

In response to the Office Action of June 9, 1998, the period for response having been extended three months to December 9, 1998 by the attached Petition and fee, please amend the application and reconsider it in view of the following:

IN THE CLAIMS:

55. (Amended) A method for using client information about clients to automatically select and present financial products appropriate for each of the clients, the method comprising:

inputting into a machine-readable storage medium the client information, information about the financial products including

plans pertaining to the financial products, and decision criteria pertaining to selection from among the financial products;

using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria; and

using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, wherein each of the client communications includes a portion of the client information for that client and a portion of the financial products information for the subset of products selected for that client, the client communication preparing step including using at least one of (a) customer information logic, (b) words/paragraphs/sentence logic, (c) product/plan/amount of coverage/payment mode/underwriting logic, and (d) pricing logic to incorporate at least one of the client information and the financial product information into a footnote within each of the client communications.

#### REMARKS

Rejection of Claims Under 35  
U.S.C. § 102(b) Based on Ryan

#### Claim 1

Independent claim 1 is not anticipated by, and patentably distinguishes over, Ryan et al. (U.S. Patent No. 5,673,402,

hereinafter "Ryan") because Ryan fails to disclose or suggest an apparatus for using client information about clients in the form of a plurality of client records to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the inputting means automatically inputting the plurality of client records without human intervention between input of the respective client records; means operatively coupled to the inputting means for storing the client information, the financial products information and the decision criteria; means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client; and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 1.

Ryan discloses a computerized investment and mortgage payment calculation system for producing an illustration of collateral, such as a life insurance policy, used to repay a mortgage. Specifically, the Office Action indicates that Ryan teaches an apparatus for using client information in the form of a plurality

of client records to automatically select and present financial products appropriate for each of the clients (column 8, lines 4-11) which includes the recited inputting means (column 18, lines 37-44), storing means (column 18, lines 27-39), selection means (column 8, lines 21-28), and communication means (column 18, lines 51-64). Applicant has reviewed the respective locations within Ryan pointed out by the examiner, as well as the balance of Ryan, and Applicant respectfully disagrees the Ryan discloses the invention as recite in claim 1.

With reference to Ryan in its entirety, the invention disclosed in Ryan is a standard manual computer system where a user can sit down with a prospective applicant for a mortgage and manually enter from a keyboard (see, e.g., column 7 lines 52-61) the prospective applicant's information. This information includes information regarding both the mortgage to be financed and the potential collateral, such as a life insurance policy or information regarding the life to be insured by such a policy (see, e.g., column 7, line 61 through column 8, line 1). The system then uses this information to provide an illustration of how the collateral can be used to pay off the mortgage over time (see, e.g., column 8 lines 1-10). This illustration is intended to be a tool for the user to demonstrate the advantages of this method (using collateral such as a life insurance policy) of paying off a

mortgage as compared to more standard methods (such as down payments and monthly principal plus interest).

The Office Action at page 2 indicates that Ryan teaches an apparatus for using client information about clients in the form of a plurality of client records to automatically select and present financial products for each of the clients (column 8, lines 4-11). As explained earlier, these lines, along with lines 1-3 of column 8, simply describe how Ryan's system uses information to provide an illustration of how the collateral can be used to pay off the mortgage over time. Nowhere in these lines or in the balance of Ryan can applicant find any teaching of using a plurality of client records to automatically select and present financial products for each of the clients as recited in claim 1. In fact, Ryan teaches away from this because Ryan teaches of manual keyboard entry of client information (e.g., column 7, lines 52-61). Additionally, Ryan teaches his invention is intended to be operated by a user to provide illustrations of a mortgage repayment by collateral to potential applicants. A person of ordinary skill in the art, having read Ryan, would take that document as teaching how to create a manual keyboard entry system for illustrating a mortgage repayment by collateral. He or she would not glean from it any suggestion or motivation to design an apparatus for using client information in the form of a plurality of client records to



automatically select and present financial products for each client, much less in the manner as recited in claim 1.

Additionally, the Office Action at page 2 indicates that Ryan also teaches means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the inputting means automatically inputting the plurality of client records without human intervention between input of the respective client records (col. 18, lines 37-44). These referenced lines of Ryan merely disclose that once a user has completed a loan repayment illustration for a prospective borrower that the system can create and print loan and insurance application forms. Nowhere in the referenced lines or in the balance of the teachings of Ryan does Ryan disclose or even suggest inputting means for automatically inputting the plurality of client records without human intervention between input of the respective client records. Again, Ryan discloses a manual keyboard entry system for processing one prospective client at a time.

Page 3 of the Office Action indicates that Ryan teaches means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria (col. 18, lines 27-39). These referenced lines of Ryan teach that the pertinent data and calculation results used for the

mortgage repayment illustration are stored in a database. Nowhere in the referenced lines or the balance of Ryan does Ryan teach of, or even suggest the use and storage of decision criteria. Again, Ryan teaches a manual keyboard entry system for illustrating a mortgage repayment by collateral, and not an apparatus for using client information, financial products information and decision criteria as recited in claim 1.

Additionally, the Office Action at page 3 indicates that Ryan teaches means operatively coupled to the storing means for using the client information, the financial products information and the decision criteria to select a subset of the financial products for each of the clients appropriate to that client (col. 8, lines 21-28). These referenced lines of Ryan teach merely that, after the client information has been entered and compiled, the system of Ryan can detect errors or omissions in the data and, if such omissions are not corrected, the system will suspend further processing of the illustration and report the need for additional information. Nowhere in these referenced lines or in the balance of Ryan does Ryan teach or even suggest means operatively coupled to the storing means for using the client information, the financial products information and the decision criteria to select a subset of the financial products for each of the clients appropriate to that client, as recited in claim 1. Ryan discloses

a loan repayment illustration system, not a system for selecting a subset of financial products based on client information, financial products information and the decision criteria, as recited in Applicant's claim 1.

Finally, the Office Action at page 3 indicates that Ryan teaches means for preparing client communication for each of the clients which identifies the subset of the financial products for that client (col. 18, lines 51-64). These referenced lines of Ryan teach the use of printers and communication systems such as a modem and the appropriate telephone lines for linking to a computer. These lines do not teach of means for preparing client communication for each of the clients which identifies the subset of the financial products for that client.

Based on the aforementioned arguments, Ryan does not disclose or anticipate the invention as recited in claim 1 and the invention as recited in claim 1 is both novel and patentably distinguishes over the invention and teachings of Ryan taken either in part or in whole.

#### Claim 2

Independent claim 2 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients comprising a plurality of client records to automatically select and present

financial products appropriate for the clients in a combination of steps which comprise automatically inputting a computer-accessible storage medium the client information including the plurality of client records without human intervention between input of the respective client records, inputting information about the financial products, and inputting decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the financial products for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products appropriate for that client, as recited in claim 2.

The deficiencies of Ryan with respect to claim 2 are similar to those set forth in claim 1. For example, Ryan does not disclose or suggest a method for using client information about clients comprising a plurality of client records to automatically select and present financial products appropriate for the clients. Ryan merely teaches of a manual keyboard entry system for illustrating a mortgage repayment by collateral.

The references on pages 3 and 4 of the Office Action to column 8, lines 4-11; column 18, lines 58-64, and column 18, lines 51-56

of Ryan are all adequately addressed in the response to the claim 1 rejection addressed earlier and the arguments set forth for claim 1 apply equally to claim 2. With respect to the reference to column 8, lines 11-17 of Ryan (page 3 of the Office Action), these lines do not disclose a method for automatically inputting a computer-accessible storage medium the client information including the plurality of client records without human intervention between input of the respective client records, inputting information about the financial products, and inputting decision criteria pertaining to selection from among the financial products. These lines of Ryan merely disclose that, once the client data has been manually entered into the Ryan system by a user at a keyboard, the information is saved in a database as a client file which will be variously updated as the user performs a sensitivity analysis. These lines do not disclose or even suggest automatic entry of client data without human interaction. In fact, the referenced lines teach away from the invention as disclosed in claim 2. A person of ordinary skill in the art would follow the teachings of Ryan and use manual keyboard entry of the client data as Ryan discloses in these lines as well as in multiple of other locations throughout Ryan.

Claim 8

Independent claim 8 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the client information comprising information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using (a) the client information including information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, (b) the financial products information, and (c) the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 8.

The deficiencies of Ryan with respect to claim 8 are similar to those set forth in claims 1 and 2. For example, Ryan does not disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients. As explained above, Ryan merely teaches a manual keyboard entry system for illustrating a mortgage repayment by collateral.

The references on pages 4 and 5 of the Office Action to column 8, lines 4-11; column 18, lines 27-39, and column 18, lines 51-56 of Ryan are all adequately addressed in the responses to claims 1 and 2 addressed above, and the arguments set forth for these claims apply equally to claim 8. With respect to the reference to column 19, lines 14-21 of Ryan (page 4 and again on page 5 of the Office Action), these lines do not disclose means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the client information comprising information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client; nor do the referenced lines disclose means operatively coupled to the storing means for using (a) the client information including information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, (b) the

financial products information, and (c) the decision criteria to select a subset of the financial products for each of the clients appropriate for that client. The referenced lines merely disclose examples of data pertaining to the transaction to be performed on the Ryan system. These examples include: (1) current interest rates and other charges for loans, (2) insurance underwriting related values, (3) all the illustrations saved in the database, and (4) administrative messages from other users. The referenced lines do not disclose or even suggest means for inputting decision criteria or means for storing decision criteria to select a subset of the financial products for each of the clients appropriate for that client.

#### Dependent Claims 9-13

Claims 9-13 are not anticipated by, and patentably distinguish over, Ryan in that they depend from, and more specifically recite the invention as set forth in claim 8. The deficiencies of Ryan with respect to claims 9-13 are similar to those set forth in claims 1 and 8.

#### Claim 15

Independent claim 15 is not anticipated by, and patentably distinguish over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for



each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the financial product information comprising a plurality of plans wherein at least one of the plans includes a plurality of the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products in the form of a plurality of the plans for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 15.

The deficiencies of Ryan with respect to claim 15 are similar to those set forth in claim 1, 2 and 8. The references on pages 6 and 7 of the Office Action to column 8, lines 4-11; column 18, lines 27-39, and column 18, lines 51-64 of Ryan are all adequately addressed in the responses to claims 1, 2, and 8 addressed above, and the arguments set forth above for these claims apply equally to claim 15.

With respect to the reference to column 22, lines 61-65 of Ryan (page 7 of the Office Action), these lines do not disclose a means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, wherein the financial product information comprises a plurality of plans, and wherein at least one of the plans includes a plurality of the financial products. Nor do the referenced lines disclose a means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products in the form of a plurality of the plans for each of the clients appropriate for that client. The referenced lines merely disclose that the Ryan system has a User Screen 3, Block 72 as referenced in Ryan Fig. 3A-1 which asks the user to select the preferred mortgage plan. The referenced lines do not disclose or even suggest means for inputting client information, financial product information, and decision criteria, nor do the referenced lines disclose or suggest storing means for using the client information, financial information and decision criteria to select a subset of products as recited in claim 15. In fact, the referenced lines teach away from these aspects of the invention in that they teach that the user selects a preferred plan. This teaches away from automatic selection of financial products as

disclosed in claim 15.

Claim 16

Independent claim 16 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, ancillary data, and decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, the ancillary data, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, ancillary data, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 16.

The deficiencies of Ryan with respect to claim 16 are similar to those set forth in claim 1, 2, 8 and 15. The references on pages 7 and 8 of the Office Action to column 8, lines 4-11; column 18, lines 27-39; column 18, lines 21-28; and column 18, lines 51-64

of Ryan are all adequately addressed in the responses to claims 1, 2, 8 and 15 addressed above, and the arguments set forth for these claims apply equally to claim 16.

With respect to the reference to column 22, lines 46-53 of Ryan (page 8 of the Office Action), these lines do not disclose a means for inputting the client information, information about the financial products, ancillary data, and decision criteria pertaining to selection from among the financial products. The referenced lines merely disclose that in the Ryan system User Screen 3, via Block 72 allows the user to select between life insurance payment schemes such as lump sum prepayments. These lines go on further to describe that the system automatically pre-selects the number and size of prepayment amounts to conform to US tax regulations. The referenced lines do not disclose or suggest means for inputting information such as decision criteria as recited in claim 16.

#### Dependent Claims 17 and 18

Claim 17 and 18 are not anticipated by, and patentably distinguish over, Ryan in that they depend from, and more specifically recite the invention as set forth in claim 16. The deficiencies of Ryan with respect to claims 17 and 18 are similar to those set forth above with respect to claims 1, 2, 8, 15, and 16.

### Claim 21

Independent claim 21 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting (a) client information, (b) information about the financial products including product price data and non-price product information, (c) and decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 21.

The deficiencies of Ryan with respect to claim 21 are similar to those as set forth above with respect to claim 1, 2, 8, 15 and 16. The references on pages 9 of the Office Action to column 8, lines 4-11; column 18, lines 27-39; and column 18, lines 51-64 of

Ryan are all adequately addressed above in the responses to claims 1, 2, 8, 15 and 16, and the arguments set forth above for these claims apply equally to claim 21. With respect to the reference to column 8, lines 29-43 of Ryan (page 9 of the Office Action), these lines do not disclose a means for inputting (a) client information, (b) information about the financial products including product price data and non-price product information, (c) and decision criteria pertaining to selection from among the financial. Nor do the referenced lines disclose a means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client. The referenced lines merely disclose that if a prospective loan applicant on the Ryan system wishes to proceed with a loan application after he has received a loan illustration, the Ryan system will allow the user to add a minimum of additional information and the system will then print out the requested applications for the applicant. These lines do not disclose or suggest either means for inputting information of the type disclosed in claim 21 such as, for example, decision criteria. Nor do they disclose means for storing information of the type disclosed in claim 21 such as, for example, decision criteria.

Claim 22

Independent claim 22 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or even suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting client information, information about the financial products, a plurality of plans each of which includes at least one of the financial products, and decision criteria pertaining to selection from among the plans, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, the plans, and the decision criteria to select a subset of the plans for each of the clients appropriate for that client, the subset of plans including at least one plan comprising a plurality of the financial products, and means for preparing a client communication for each of the clients which identifies the subset of plans for that client, as recited in claim 22.

The deficiencies of Ryan with respect to claim 22 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16 and 21. The references on page 10 of the Office Action to column 8,

lines 4-11; column 22, lines 61-65; column 18, lines 27-39; column 22, lines 46-53; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16 and 21, and the arguments set forth above for these claims apply equally to claim 22.

#### Claim 23

Independent claim 23 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication preparing means incorporating a portion of the client information



other than a client name, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, as recited in claim 23.

The deficiencies of Ryan with respect to claim 23 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21 and 22. The references on page 11 of the Office Action to column 8, lines 4-11; column 18, lines 37-44; column 18, lines 27-39; column 8, lines 21-28; and column 19, lines 14-21 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21 and 22, and the arguments set forth above for these claims apply equally to claim 23.

#### Dependent Claim 24

Claim 24 is not anticipated by, and patentably distinguishes over, Ryan in that it depends from and more specifically recites the invention as set forth in claim 23. The deficiencies of Ryan with respect to claim 24 are similar to those as set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, and 23.

#### Claim 25

Independent claim 25 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients, in a combination of elements which comprise

means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication means further using words/paragraphs/sentence logic to incorporate at least one of variable words, variable paragraphs, and variable sentences into each of the client communications, as recited in claim 25.

The deficiencies of Ryan with respect to claim 25 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22 and 23. The references on pages 12 and 13 of the Office Action to column 8, lines 4-11; column 18, lines 37-44; column 8, lines 21-28; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22 and 23, and the arguments set forth above for these claims apply equally to claim 25.

#### Dependent Claim 27

Claim 27 is not anticipated by, and patentably distinguishes over, Ryan in that it depends from and more specifically recites the invention of claim 25. The deficiencies of Ryan with respect to claim 25 are similar to those set forth in claims 1, 2, 8, 15, 16, 21, 22, 23 and 25.

#### Claim 28

Independent claim 28 is not anticipated by Ryan because Ryan fails to disclose or even suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients, in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication preparing means incorporating into each of the client

communications a portion of the client information for that client and a portion of the financial products information for the subset of products selected for that client, the client communication preparing means further using at least one of (a) customer information logic, (b) words/paragraphs/sentence logic, (c) product/plan/amount of coverage/payment mode/underwriting logic, and (d) pricing logic to incorporate at least one of the client information and the financial product information into a footnote within each of the client communications, as recited in claim 28.

The deficiencies of Ryan with respect to claim 28 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23 and 25. The references on pages 13 and 14 of the Office Action to column 8, lines 4-11; column 8, lines 11-17; column 18, lines 27-39; column 8, lines 21-28; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23 and 25, and the arguments set forth above as to these claims apply equally to claim 28.

#### Dependent Claim 29

Claim 29 is not anticipated by, and patentably distinguishes over, Ryan in that it depends from and more specifically recites the invention as set forth in claim 28. The deficiencies of Ryan with respect to claim 29 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25 and 28, and the

arguments presented for them apply with equal force as to claim 29.

Claim 35

Independent claim 35 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a computer-accessible storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, the client information comprising information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, using a central processing unit in communication with the storage medium to select for each of the clients a subset of the financial products appropriate for that client using (a) the client information including the information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, (b) the financial products information, and (c) the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 35.

The deficiencies of Ryan with respect to claim 35 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25 and 28. The references on pages 13 and 14 of the Office Action to column 8, lines 4-11; column 19, lines 14-21; and column 18, lines 51-56 of Ryan are all addressed above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25 and 28, and the arguments set forth there apply equally to claim 35.

Claims 36, 37, 39, and 40

Claims 36, 37, 39, and 40 are not anticipated by, and patentably distinguish over, Ryan in that they depend from and more specifically recite the invention of claim 35. The deficiencies of Ryan with respect to claims 36, 37, 39, and 40 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28 and 35, and the arguments set forth there apply here as well.

Claim 42

Independent claim 42 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a computer-accessible storage medium the client information, information about the financial products, and decision

criteria pertaining to selection from among the financial products, the financial product information including a plurality of plans wherein at least one of the plans includes a plurality of the financial products, using a central processing unit in communication with the storage medium to select a subset of the financial products in the form of a plurality of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 42.

The deficiencies of Ryan with respect to claim 42 are similar to those set forth in claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28 and 35. The references on pages 16 and 17 of the Office Action to column 8, lines 4-11; column 22, lines 61-65; column 22, lines 46-53; and column 18, lines 51-56 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28 and 35, and the arguments set forth for these claims apply equally to claim 42.

#### Claim 43

Independent claim 43 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or even suggest a method for using client information about clients to

automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a computer-accessible storage medium the client information, information about the financial products, ancillary data, and decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select for each of the clients a subset of the financial products appropriate for that client using the client information, the financial products information, the ancillary data and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 43.

The deficiencies of Ryan with respect to claim 43 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35 and 42. The references on pages 17 and 18 of the Office Action to column 8, lines 4-11 and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35 and 42, and the arguments set forth for these claims apply equally to claim 43.

With respect to the reference to column 20, lines 6-10 of Ryan (page 17 of the Office Action), these lines do not disclose inputting into a computer-accessible storage medium client



information, information about the financial products, ancillary data, and decision criteria pertaining to selection from among the financial products. These referenced lines merely disclose two of the Main Menu features of the Ryan system, which are access to main illustration screen, and access to an Update Database function. These lines do not disclose or suggest inputting information as recited in claim 43, for example, such as decision criteria, nor do they disclose means for storing information as recited in claim 43, for example, such as decision criteria.

With respect to the reference to column 20, lines 12-15 of Ryan (page 17 of the Office Action), these lines do not disclose using a central processing unit in communication with the storage medium to select a subset of the financial products appropriate for that client using the client information, the financial products information, the ancillary data and the decision criteria. Again, these referenced lines merely disclose several reporting and communication features accessible from the various menu driven screens of the Ryan system. Specifically, these lines describe Analyze, a screen providing access to various reports and statistical packages and Electronic Mail, a feature for electronic communication between users. These lines do not disclose or suggest the use of a central processing unit in communication with a storage medium to select from a subset of financial products

appropriate for that client using the client information, the financial products information, the ancillary data, and the decision criteria.

Dependent Claims 44 and 45

Claims 44 and 45 are not anticipated by, and patentably distinguish over, Ryan in that they depend from and more specifically recite the invention as set forth in claim 43. The deficiencies of Ryan with respect to claims 44 and 45 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, and 43.

Claim 48

Independent claim 48 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products including product price data and non-price product information, and (c) decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the financial products for each of the clients appropriate for that client using the client

information, the financial products information including the non-price product information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 48.

The deficiencies of Ryan with respect to claim 48 are similar to those set forth with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, and 43. The references on pages 18 and 19 of the Office Action to column 8, lines 4-11; column 8, lines 11-17; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42 and 43, and the arguments set forth for these claims apply equally to claim 48.

#### Claim 49

Independent claim 49 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a machine-readable storage medium the client information, information about the financial products, a plurality of plans each of which includes at least one of the financial products, and decision criteria pertaining to selection from among

the plans, using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, the plans and the decision criteria, the subset of the plans including at least one plan comprising a plurality of the financial products, and using an output device to prepare a client communication for each of the clients which identifies the subset of the plans for that client, as recited in claim 49.

The deficiencies of Ryan with respect to claim 49 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43 and 48. The references on pages 19 and 20 of the Office Action to column 8, lines 4-11; column 22, lines 61-65; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43 and 48, and the arguments set forth above for these claims apply equally to claim 49.

#### Claim 50

Independent claim 50 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise

inputting into a machine-readable storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, the client communication incorporating a portion of the client information other than a client name, address, age, marital status, tobacco habits, and amount of life insurance coverage for a given client, as recited in claim 50.

The deficiencies of Ryan with respect to claim 50 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48 and 49. The references on pages 20 and 21 of the Office Action to column 8, lines 4-11; column 22, lines 46-53; column 18, lines 51-64; and column 19, lines 14-21 of Ryan are all addressed above in the responses to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48 and 49, and the arguments set forth for these claims apply equally to claim 50.

#### Dependent Claim 51

Claim 51 is not anticipated by, and patentably distinguishes over, Ryan in that it depends from and more specifically recites the invention of claim 50. The deficiencies of Ryan with respect to claim 51 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49 and 50, and the arguments set forth above as to those claims applies here as well.

#### Claim 52

Independent claim 52 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in combination with steps which comprise inputting into a machine-readable storage medium the client information, information about the financial products, and decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial

products for that client, the client communication preparing step further including using words/paragraphs/ sentence logic to incorporate at least one of variable words, variable paragraphs, and variable sentences into each of the client communications, as recited in claim 52.

The deficiencies of Ryan with respect to claim 52 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49 and 50. The references on pages 21 and 22 of the Office Action to column 8, lines 4-11; column 22, lines 46-53; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49 and 50, and the arguments set forth above as to these claims apply equally to claim 52.

#### Dependent Claim 54

Claim 54 is not anticipated by, and patentably distinguishes over, Ryan in that it depends from and more specifically recites the invention as set forth in claim 52. The deficiencies of Ryan with respect to claim 54 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50 and 52, and the corresponding arguments as set forth above apply here as well.

Claim 55

Independent claim 55 is not anticipated by, and patentably distinguishes over, Ryan because Ryan fails to disclose or even suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in combination with steps which comprise inputting into a machine-readable storage medium the client information, information about the financial products including plans pertaining to the financial products, and decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the plans for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, wherein each of the client communications includes a portion of the client information for that client and a portion of the financial products information for the subset of products selected for that client, the client communication preparing step including using at least one of (a) customer information logic, (b) words/paragraphs/sentence logic, (c) product/plan/amount of coverage/payment mode/underwriting logic, and (d) pricing logic to



incorporate at least one of the client information and the financial product information into a footnote within each of the client communications, as recited in claim 55.

The deficiencies of Ryan with respect to claim 55 are similar to those set forth above with respect to claim 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50 and 52. The references on pages 22 and 23 of the Office Action to column 8, lines 4-11; column 18, lines 37-44; column 22, lines 61-65; and column 18, lines 51-64 of Ryan are all addressed above in the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50 and 52, and the arguments set forth above for these claims apply equally to claim 55.

#### Dependent Claim 56

Claim 56 is not anticipated by, and patentably distinguishes over, Ryan because it depends from and more specifically recites the invention of claim 55. The deficiencies of Ryan with respect to claim 56 are similar to those set forth as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55. The corresponding arguments set forth above also apply as to claim 56.

#### Rejection of Claims 3-7, 11, 30-34, and 38 Under 35 U.S.C. § 103(a) based on Ryan

#### Dependent Claims 3-7 and 30-34

Claims 3-7 and 30-34 patentably distinguish over Ryan art in that they depend from and more specifically recite the invention as

set forth in claims 1 and 2 respectively. As explained above, independent claims 1 and 2 are not anticipated by Ryan and patentably distinguish over Ryan. The Office Action does not cite any additional references to prior art for the rejection of claims 3-7 and 30-34. Therefore, for this reason alone, claims 3-7 and 30-34 are not anticipated by, and patentably distinguish over, Ryan. Further deficiencies of Ryan with respect to claims 3-7 and 30-34 are similar to those set forth above as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55.

#### Dependent Claims 11 and 38

Claims 11 and 38 also patentably distinguish over Ryan in that they depend from and more specifically recite the invention as set forth in claims 8 and 35, respectively. As demonstrated above, independent claims 8 and 35 are not anticipated by Ryan and patentably distinguish over Ryan. The Office Action does not cite any additional references to prior art for the rejection of claims 11 and 38. Therefore, claims 11 and 38 are not anticipated by, and patentably distinguish over, Ryan. Further deficiencies of Ryan with respect to claims 3-7 and 30-34 are similar to those set forth above as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55.

Claim 19

Independent claim 19 patentably distinguishes over Ryan because Ryan fails to disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting (a) the client information, (b) information about the financial products including at least one term life insurance product and at least one insurance product other than a term life insurance product, and (c) decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, the subset of the financial products including the at least one term life insurance product and the at least one insurance product other than a term life insurance product, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 19.

The deficiencies of Ryan with respect to claim 19 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55. For example, Ryan does not disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients. As explained previously, Ryan merely teaches a manual keyboard entry system for illustrating a mortgage repayment by collateral. A person of ordinary skill in the art, having read Ryan, would be led to create a manual keyboard entry system for illustrating a mortgage repayment by collateral. Ryan fails to suggest or motivate such person, however, to design an apparatus for using client information in the form of a plurality of client records to automatically select and present financial products for each client.

The reference on page 25 of the Office Action to column 18, lines 51-56 of Ryan is addressed above with respect to the responses as to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55, and the arguments set forth there apply equally to claim 19. The reference on page 25 to column 8 does not include any line number cross reference. Because the location of this cross reference appears to correspond to cross references to column 8, lines 4-11 as used in virtually every other independent

claim rejection, Applicant assumes that this is the intended cross reference here. In this case, reference to column 8, lines 4-11 of Ryan is addressed above regarding the responses to claims 1, 2, 8, 15, 16, 21, 22, 23, 25, 28, 35, 42, 43, 48, 49, 50, 52 and 55, and the arguments set forth for these claims apply equally to claim 19. In the case that any other lines were intended for this cross reference, Applicant has reviewed column 8 of Ryan in its entirety and column 8 does not disclose or even suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients as recited in claim 19.

#### Claim 46

Independent claim 46 patentably distinguishes over Ryan because Ryan fails to disclose or even suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients, in a combination of elements which comprise inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products including at least one term life insurance product and at least one insurance product other than a term life insurance product, and (c) decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select

for each of the clients a subset of the financial products appropriate for that client using the client information, the financial products information, and the decision criteria, the subset of the financial products including the at least one term life insurance product and the at least one insurance product other than a term life insurance product, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 46.

The deficiencies of Ryan with respect to claim 46 are similar to those set forth in claim 19, and the arguments presented above with respect to claim 19 apply with equal force here.

Rejection of Claims 14, 20, 41, and 47  
Under 35 U.S.C. § 103(a)  
Based on Ryan in View of Clark et al.

Claim 14

Independent claim 14 patentably distinguishes over Ryan because Ryan fails to disclose or even suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products including financial products having the differing face value amounts, and decision criteria pertaining to selection from among

the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, the selecting means including means for selecting the subset of financial products to include the financial products having the differing face value amounts, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 14.

The deficiencies of Ryan with respect to claim 14 are similar to those set forth above with respect to claims 1, 2, 8, 15, 16, 19, 21, 22, 23, 25, 28, 35, 42, 43, 48, 46, 49, 50, 52 and 55. For example, Ryan does not disclose or suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients.

As explained previously, Ryan merely teaches of a manual keyboard entry system for illustrating a mortgage repayment by collateral. A person of ordinary skill in the art, having read Ryan, may learn how to create a manual keyboard entry system for illustrating a mortgage repayment by collateral, but Ryan fails to

teach, suggest or otherwise motivate such individual to design an apparatus for using client information to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria for selection from among the financial products, means for storing the various information and decision criteria, means for using the various information and decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, in a combination as recited in claim 14.

The references on pages 27 and 28 of the Office Action to column 8, lines 4-11; column 18, lines 27-39; column 18, lines 51-56; and column 24, lines 61-65 of Ryan are addressed above in the responses as to claims 1, 2, 8, 15, 16, 19, 21, 22, 23, 25, 28, 35, 42, 43, 46, 48, 49, 50, 52 and 55, and the arguments set forth for these claims apply equally to claim 14.

Clark et. al. (U.S. Patent No. 5,710,889) teaches an electronic delivery system that integrates interactive financial services to allow access to multiple financial products from a single location. Clark et al. does not disclose and fails to even



suggest an apparatus for using client information to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting the client information, information about the financial products, and decision criteria for selection from among the financial products, means for storing the various information and decision criteria, means for using the various information and decision criteria to select a subset of the financial products for each of the clients appropriate for that client, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 14. A person of ordinary skill in the art would not even look to electronic delivery systems art in attempting to address the problems associated with designing an apparatus for using client information to automatically select and present financial products appropriate for each of the clients.

The Office Action references Clark et al. at column 24, lines 61-65 in an attempt to address the deficiencies of Ryan with respect to claim 14. Column 24, lines 61-65 of Clark et al. simply describes various types of information items which the Clark et al. invention can report. This reference adds nothing to the Ryan disclosure which addresses the deficiencies of Ryan with regard to Claim 14. Claim 14 patentably distinguishes over Ryan with or

without reference to Clark et al.

Claim 20

Independent claim 20 patentably distinguishes over Ryan, alone or in combination with Clark et al., because both Ryan and Clark et al. fail to disclose or even suggest an apparatus for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of elements which comprise means for inputting (a) the client information, (b) information about the financial products wherein the financial products have differing face values, and (c) decision criteria pertaining to selection from among the financial products, means operatively coupled to the inputting means for storing the client information, the financial products information, and the decision criteria, means operatively coupled to the storing means for using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, wherein the subset of financial products includes the financial products having differing face values, and means for preparing a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 20.

The deficiencies of Ryan, Clark et al., and Ryan in combination with Clark et al. with respect to claim 20 are similar to those set forth above with respect to claim 14. Claim 20 patentably distinguishes over Ryan with or without reference to Clark et al. for the reasons set forth above.

Claim 41

Independent claim 41 patentably distinguishes over Ryan, alone or in combination with Clark et al., because both Ryan and Clark et al. fail to disclose or even suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a computer-accessible storage medium the client information, information about the financial products including financial products having differing face value amounts, and decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the financial products using the client information, the financial products information, and the decision criteria to select a subset of the financial products for each of the clients appropriate for that client, the selecting step including selecting the subset of financial products to include the financial products having the differing face value amounts, and using an output device

to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 41.

The deficiencies of Ryan, Clark et al., and Ryan in combination with Clark et al. with respect to claim 41 are similar to those set forth above with respect to claims 14 and 20. Claim 41 patentably distinguishes over Ryan with or without reference to Clark et al. for the reasons set forth above as to those claims.

#### Claim 47

Independent claim 47 patentably distinguishes over Ryan, alone or in combination with Clark et al., in that both Ryan and Clark et al. fail to disclose or even suggest a method for using client information about clients to automatically select and present financial products appropriate for each of the clients in a combination of steps which comprise inputting into a machine-readable storage medium (a) the client information, (b) information about the financial products wherein the financial products have differing face values, and (c) decision criteria pertaining to selection from among the financial products, using a central processing unit in communication with the storage medium to select a subset of the financial products for each of the clients appropriate for that client using the client information, the financial products information, and the decision criteria, wherein

the subset of financial products includes the financial products having differing face values, and using an output device to prepare a client communication for each of the clients which identifies the subset of the financial products for that client, as recited in claim 47.

The deficiencies of Ryan, Clark et al., and Ryan in combination with Clark et al. with respect to claim 47 are similar to those set forth above with respect to claims 14, 20, and 41. Claim 47 patentably distinguishes over Ryan with or without reference to Clark et al. for the reasons set forth above with respect to those claims.

#### Dependent Claims 26 and 53

Claims 26 and 53 patentably distinguish over Ryan in that they depend from, and more specifically recite the invention as set forth in claims 25 and 52, respectively. As shown previously, independent claims 25 and 52 are not anticipated by Ryan and patentably distinguish over Ryan.

The deficiencies of Ryan, Clark et al., or Ryan in combination with Clark et al., with regard to independent claims 26 and 53 are similar to those set forth above with respect to claim 14. Claims 26 and 53 patentably distinguish over Ryan, alone or in combination with Clark et al., for the reasons set forth above with regard to claim 14.

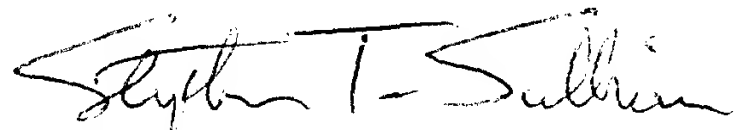
Applicant acknowledges the Notice of Draftsperson's Patent Drawing Review. Applicant has submitted concurrently with this Amendment a set for formal drawings. Applicant submits that these formal drawings satisfactorily address the points raised in the Notice.

In conclusion, Applicant respectfully submits that claims 1-56 as presented are not anticipated by and patentably distinguish over the cited and applied references, and that these claims are in condition for allowance. Reconsideration of the application is requested in view of the remarks set forth above.

A Petition for a three-month extension of time and fee are being filed concurrently herewith. If any additional fees or amounts are due in connection with the filing of this paper or the prosecution of this application, please notify the undersigned so the fee can be promptly submitted.

Dated: November 13, 1998

Respectfully submitted,

A handwritten signature in cursive script, reading "Stephen T. Sullivan".

Stephen T. Sullivan

Reg. No. 32,444